

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

CASE NO.: 1:20-cv-04874-SCJ

MORGAN HOWARTH,

Plaintiff,

v.

HERO BUILD SOLUTIONS LLC,

Defendant.

DECLARATION OF JOEL B. ROTHMAN
IN SUPPORT OF MOTION FOR FINAL DEFAULT

I, Joel B. Rothman, declare and say:

1. I am an attorney duly licensed to practice before this Court, and I am counsel for Plaintiff MORGAN HOWARTH (“HOWARTH”) in the above-captioned matter. I make this Declaration, which is filed in support of Plaintiff’s Motion for Entry of a Final Judgment of Default and Incorporated Memorandum of Law, and I could and would testify competently to the matters set forth herein.
2. On December 2, 2020, Howarth filed his Complaint against Defendant HERO BUILD SOLUTIONS LLC (“HBS”) [ECF 1].
3. Howarth has incurred \$457.39 in costs in pursuit of this case.

4. This figure includes \$55.39 for process service and \$402.00 in filing fees.

5. In addition to these costs, Howarth has incurred \$3,435.00 in attorney's fees.

6. Attached as Exhibit 1 is our invoice that details the work done by SRIPLAW in connection with this matter.

7. HBS has failed to answer or otherwise respond to the Complaint or serve a copy of any Answer or other response in this action.

8. Considerable time was spent investigating the factual circumstances of the matter, drafting the notice letter to HBS, communicating with the Defendant, drafting the Complaint in this matter, obtaining the Default, and drafting the Motion for entering Default Judgment, and corresponding Declarations.

9. My billing rate is \$475 per hour and I expended 1 hour on this matter.

10. Attorney Craig A. Wirth has a billing rate \$350 per hour and expended .7 hour on this matter.

11. Attorney Meir Teitelbaum has a billing rate of \$300 per hour and expended .7 hours on this matter.

12. Associate Angela Nieves has a billing rate of \$250 per hour and expended 4.7 hours on this matter.

13. Paralegal Jamie Christine James has a billing rate of \$200 per hour and expended 4.7 hours on this matter.

14. Client Services Liaison Brandy Brown has a billing rate of \$175.00 and expended .5 hours on this matter.

15. Legal Assistant Lia M. DiNuzzo has a blended billing rate of \$125 per hour and expended 0.8 hours on this matter.

16. Client Services Liaison Tyler S. Unfer has a billing rate of \$175 and expended 2.8 hours on this matter.

17. Following the lodestar method of multiplying the per hour billing rate times the number of hours expended on the matter, the total amount of attorney's fees is \$3,435.00.

18. These fees are reasonable because they reflect the market rate for services of similar quality and nature in the local area.

I declare under perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 31, 2021 at Boca Raton, Florida.

Joel B. Rothman
JOEL B. ROTHMAN